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February 7, 2002

Via Electronic Filing
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Proposed First Quarter 2002 Universal Service Contribution Factor, CC Docket No. 96-45; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; 1998 Biennial Regulatory Review — Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, CC Docket 98-171; Telecommunications Services for Individuals with Hearing Speech Disabilities and the Americans with Disabilities Act of 1990, CC Docket No. 90-571; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size, CC Docket No. 92-237, NSD File No. L-00-72; Number Resource Optimization, CC Docket No. 99-200; and Telephone Number Portability, CC Docket No. 95-11 6Application by Verizon-New England Inc. for Authorization to Provide In-Region InterLATA Services in the State of Rhode Island, CC Docket No. 01-324

Dear Mr. Caton:

Re:

Yesterday, February 6, 2002, I spoke with Jordan Goldstein, Legal Adviser to Commissioner Copps, to review AT&T's comments in the Universal Service Contribution Factor docket which requested, if necessary, a modification or waiver the rule that requires carriers to complete the Telecommunications Reporting Worksheet using revenue figures that are lagged by six months and instead utilize a projection of First Quarter 2002 revenues. The specific proposal was set forth in an ex parte communication filed with the Commission on December 13, 2001. I also explained how the how the Commission could make that request effective on either March 1,

2002 or April 1, 2002, the beginning of the second quarter. I also urged the Commission to continue working towards a permanent mechanism that would eliminate the lag effect in its entirety and adopt a flat-rate assessment mechanism consistent with our comments, reply comments and other Coalition filings in this proceeding.

Additionally, I also discussed the fact that, consistent with AT&T's comments filed in this proceeding, Verizon's UNE rates in Rhode Island are not TELRIC-compliant and Verizon's long distance entry in Rhode Island is not in the public interest. I further discussed the New York Public Service Commission's January 28, 2002 UNE Order and demonstrated that using those rates as a benchmark provides conclusive evidence that Verizon's rates in Rhode Island do not comply with TELRIC principles.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. One copy of this Notice are being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Very truly yours,

Robert W. Zummy.

cc: Jordan Goldstein